



February 17, 2015

Mary D. Nichols
Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: SUPPORT FOR LCFS READOPTION AND ADF REGULATION ADOPTION at February 19-20, California Air Resources Board Hearing

Dear Chair Nichols:

Please accept these brief comments from the California Biodiesel Alliance (CBA) in support of both the readoption of the Low Carbon Fuel Standard (LCFS) and the adoption of the Alternative Diesel Fuel (ADF) regulation. CBA is California's not-for-profit biodiesel industry trade association, representing over 50 businesses and stakeholders, including all of the state's biodiesel producers. CBA strives to increase awareness about biodiesel as California's leading and widely available advanced biofuel that delivers significant economic, environmental, and energy diversity benefits throughout the state.

We submit these comments as part of a unified statement from the biodiesel industry, and specifically support the comments of the National Biodiesel Board (NBB) on both program areas, including the technical issues related to ARB's updating of the carbon intensities for biofuels.

First, we wish to thank your California Air Resources Board (ARB) staff for their diligent and inclusive process of seeking and incorporating public comments and specifically for working with our industry over many years as we have endeavored to assure accuracy for biodiesel pathways under LCFS and to finally achieve full legal acceptance for biodiesel. We very much appreciate staff's extraordinary investment of resources and expertise in implementing state law, including California's notable progress in reaching its goals under AB 32, while working to provide the critically needed stable regulatory environment required by the investor community.

In our previous comments on the LCFS, CBA has supported key ARB proposals, including for the Compliance Curve and the Price Cap, and have weighed in on the details of the abundant supply of biodiesel available to help reach program targets. Our industry is happy to have generated a steadily increasing percentage of LCFS credits, up to 13% in Q3 2014. We value our ability to make this contribution to the success of LCFS as the world looks to California for solutions to the dire realities of climate change.



In urging your adoption of the ADF regulation, we wish to express our appreciation for the framework that allows biodiesel to move forward with some time to develop a new NOx mitigation additive and for the exemptions for light and medium duty fleets and for those with 90% NTDEs. We support the 2019 review that will provide for data on actual vehicle miles traveled as fleets turnover to the use of NTDEs. CBA looks forward to continued discussions with ARB staff on ways to address the concerns of some of our member companies, as expressed in their written comments, and to the adoption of the best possible final ADF regulation.

We appreciated Richard Corey's recent reference to the state's reliance on biodiesel for "future reductions of toxic diesel particulate matter" in his presentation at the California Biodiesel Conference on February 4th in Sacramento. Our industry will continue to bring that and other of biodiesel's many benefits to California, especially to communities that are economically disadvantaged and suffer disproportionately from diesel emissions-related diseases.

Thank you again for your leadership. We applaud your success and look forward to working with you going forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Curtis Wright".

Curtis Wright
Chairman
California Biodiesel Alliance

Cc: California Air Resources Board